

EXHIBIT 1**Matters for Examination for Rule 30(b)(6) Deposition of Defendant:**

	Topic/Subtopic	Relevant Period	Relevance	Status
1(a)	[For each Program] When You started providing the Program to IOI Customers.	1	Provided the remuneration	Addressed in a written answer on Aug. 2, 2024
1(b)	[For each Program] When You stopped providing the Program to IOI Customers.		Provided the remuneration	Addressed in a written answer on Aug. 2, 2024
1(c)	[For each Program] Whether the Program was branded or unbranded.	1	Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
1(d)	[For each Program] Whether You provided the Program to all physician practices that prescribed Remicade and/or Simponi ARIA or only to targeted physician practices.	1	Value of the remuneration; Purpose was to induce Rx/sales	Addressed in a written answer on Aug. 2, 2024
1(e)	[For each Program] The factors that were considered in determining which physician practices received the Program.	1	Purpose was to induce Rx/sales	Withdrawn
1(f)	[For each Program] Whether You paid a vendor or Outside Consultant to develop the Program and the approximate amount You paid the vendor or Outside Consultant to develop the Program.	1	Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
1(g)	[For each Program] Whether the Program was provided to IOI Customers in person and/or remotely by an ABS.	1	Provided the remuneration; Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
1(h)	[For each Program] Whether You paid an Outside Consultant to provide the Program to IOI Customers in person and/or remotely and the amount You paid for the presentation of the Program.	1	Provided the remuneration; Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
1(i)	[For each Program] Whether You had ABSs in the Oncology division provide the Program (or substantive equivalent) to oncology practices.	1	Value of the remuneration	
1(j)	[For each Program] All Your purposes and objectives in providing the Program to IOI Customers.	1	Purpose was to induce Rx/sales	
1(k)	[For each Program] The amount You charged IOI Customers for the Program.	1	Provided the remuneration; Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
1(l)	[For each Program] The actions You took to evaluate the benefit or value, including the independent value, that IOI Customers received from the Program.	1	Value of the remuneration	

	Topic/Subtopic	Relevant Period	Relevance	Status
1(m)	[For each Program] Your belief and knowledge concerning the benefit and/or value, including the independent value, that IOI Customers received from the IOI Support, the bases for such belief. Included in this topic are the results of any assessments or analyses You performed to review or determine the benefit or value, including the independent value, that IOI Customers received from the IOI Support.	1	Value of the remuneration	
1(n)	[For each Program] Your knowledge concerning the prescriptions and infusions of Remicade and/or Simponi ARIA to patients including Medicare patients that resulted from and/or were influenced by Your provision of the Program to IOI Customers. Included in this topic are the results of any assessments or analyses You performed concerning whether receiving the Program caused, impacted, or influenced the recipient to prescribe and/or utilize Remicade and/or Simponi ARIA.	1	Purpose was to induce Rx/sales; Providing the remuneration resulted in Rx/false claims	
1(o)	[For each Program] Whether you advertised to physicians and patients that you provided the Program to IOI Customers.	1	Scienter	
1(p)	[For each Program] All actions You took to determine whether providing the Program to IOI Customers violated the AKS and/or FCA.	1	Scienter	
1(q)	[For each Program] Whether the Program was reviewed by Your legal department separate and apart from any review conducted by an attorney in connection with a Promotional Review Committee (or equivalent committee) review. Included in this topic are the review process, the approximate dates of the reviews, and persons from the legal department who performed the reviews.	1	Scienter	
1(r)	[For each Program] Your belief and knowledge concerning whether providing the Program to IOI Customers violated the AKS and the bases for such belief.	1	Scienter	
2(a)	[For the IOI Support as a whole] Whether You provided the IOI Support to all physician practices that prescribed Remicade and/or Simponi ARIA or only to targeted physician practices.	2	Value of the remuneration; Purpose was to induce Rx/sales	Addressed in a written answer on Aug. 2, 2024
2(b)	[For the IOI Support as a whole] The factors that were considered in determining which physician practices received the IOI Support.	2	Purpose was to induce Rx/sales	Withdrawn
2(c)	[For the IOI Support as a whole] All Your purposes and objectives in providing the IOI Support to IOI Customers.	2	Purpose was to induce Rx/sales	

	Topic/Subtopic	Relevant Period	Relevance	Status
2(d)	[For the IOI Support as a whole] The amounts You spent each year providing the IOI Support to IOI Customers (through ABSs and Outside Consultants) and Your return on investment concerning the provision of the IOI Support to IOI Customers.	2	Value of the remuneration; Purpose was to induce Rx/sales	Addressed in a written answer on Aug. 2, 2024
2(e)	[For the IOI Support as a whole] The amount You charged IOI Customers for the IOI Support.	2	Provided the remuneration; Value of the remuneration	Addressed in a written answer on Aug. 2, 2024
2(f)	[For the IOI Support as a whole] The actions You took to evaluate the benefit or value, including the independent value, that IOI Customers received from the IOI Support.	2	Value of the remuneration; Scienter	No issue raised in Mot. for Protective Order
2(g)	[For the IOI Support as a whole] Your belief and knowledge concerning the benefit and/or value, including the independent value, that IOI Customers received from the IOI Support, the bases for such belief. Included in this topic are the results of any assessments or analyses You performed to review or determine the benefit or value, including the independent value, that IOI Customers received from the IOI Support.	2	Value of the remuneration; Scienter	No issue raised in Mot. for Protective Order
2(h)	[For the IOI Support as a whole] Your knowledge concerning the prescriptions and infusions of Remicade and/or Simponi ARIA to patients including Medicare patients that resulted from and/or were influenced by Your provision of the IOI Support to IOI Customers. Included in this topic are the results of any assessments or analyses You performed concerning whether receiving the IOI Support caused, impacted, or influenced the recipient to prescribe and/or utilize Remicade and/or Simponi ARIA.	2	Purpose was to induce Rx/sales; Providing the remuneration resulted in Rx/false claims	No issue raised in Mot. for Protective Order
2(i)	2(i) [For the IOI Support as a whole] Whether You advertised to physicians and patients that you provided the IOI Support to IOI Customers.	2	Scienter	No issue raised in Mot. for Protective Order
2(j)	2(j) [For the IOI Support as a whole] All actions You took to determine whether providing the IOI Support and Programs to IOI Customers violated the AKS and/or FCA.	2	Scienter	
2(k)	2(k) [For the IOI Support as a whole] Whether the provision of the IOI Support to IOI Customers was reviewed by Your legal department separate and apart from any review conducted by an attorney in connection with a Promotional Review Committee (or equivalent committee) review. Included in this topic are the review process, the approximate dates of the reviews, and persons from the legal department who performed the reviews.	2	Scienter	

	Topic/Subtopic	Relevant Period	Relevance	Status
2(l)	2(l) [For the IOI Support as a whole] Your belief and knowledge concerning whether providing the IOI Support to IOI Customers violated the AKS and the bases for such belief.	2	Scienter	
3(a)	[Your methods and practices for tracking and/or recording] When an ABS or Outside Consultant provided advice, education, or assistance to a health care provider or his/her staff concerning opening an IOI within a physician practice.	3	Provided the remuneration; Acted knowingly	No issue raised in Mot. for Protective Order
3(b)	[Your methods and practices for tracking and/or recording] When an ABS or Outside Consultant provided a Program to an IOI Customer.	3	Provided the remuneration	No issue raised in Mot. for Protective Order
3(c)	[Your methods and practices for tracking and/or recording] The persons from IOI Customers who attended a Program.	3	Provided the remuneration	No issue raised in Mot. for Protective Order
3(d)	[Your methods and practices for tracking and/or recording] The benefit and/or value, including the independent value, of a Program to the recipient.	3	Value of the remuneration	No issue raised in Mot. for Protective Order
3(e)	[Your methods and practices for tracking and/or recording] The amount You spent providing the Program and/or IOI Support(through ABSs and Outside Consultants).	3	Value of the remuneration; Purpose was to induce Rx/sales	No issue raised in Mot. for Protective Order
3(f)	[Your methods and practices for tracking and/or recording] The return You received from providing the Program and/or IOI Support.	3	Value of the remuneration; Purpose was to induce Rx/sales; Providing the remuneration resulted in Rx/false claims	No issue raised in Mot. for Protective Order
4	Your knowledge and understanding concerning (a) the AKS, (b) the safe harbor regulations, and (c) the Office of Inspector General for the U.S. Department of Health and Human Services's guidance concerning the provision of product-related services to customers.	2	Scienter	
5	The actions You took to train Your employees who were responsible for evaluating the legality of providing the IOI Support concerning conduct prohibited by the AKS, including the provision of services that have independent value to customers.	2	Scienter	

	Topic/Subtopic	Relevant Period	Relevance	Status
6	Whether any of Your employees or agents advised or expressed a concern or belief that Your provision of the IOI Support and/or Programs to IOI Customers violated: (a) the law including the AKS and/or FCA, and/or (b) Your compliance policies concerning the provision of consulting, product-related services, and/or educational services to customers.	2	Scienter	No issue raised in Mot. for Protective Order
7	All legal actions that You have settled and/or a judgment or verdict was entered against You in which it was alleged that You violated the AKS.		Scienter	No issue raised in Mot. for Protective Order
8	Your asserted belief that You acted in good faith when providing the IOI Support to IOI Customers and the asserted bases for this belief.		Affirmative defense	No issue raised in Mot. for Protective Order
9	The Federal Government's investigation(s) referenced in Your answer to Interrogatory 15 and any findings and/or determinations that the Federal Government communicated to You in connection with the Federal Government's investigation(s).		Affirmative defense	No issue raised in Mot. for Protective Order
10	Your reasons for not reporting the IOI Support and/or Programs that were provided to IOI Customers to the Centers for Medicare & Medicaid Services under 42 C.F.R. § 403.904 and 42 U.S.C. § 1320a-7h, including identification of the individuals who made the decision(s) to not report the IOI Support and/or Programs that were provided to IOI Customers to Centers for Medicare & Medicaid Services.	4	Scienter	No issue raised in Mot. for Protective Order
11	Your compliance policy and/or guidance document (and equivalents thereof) concerning the topics of (i) providing consulting and/or services to customers (see, e.g., JANSSENBIO-037-00000844 (Guidance Doc. 2); JANSSENBIO-018-00000067; JANSSENBIO-031-00016550; JANSSENBIO-045-00000537 (Ch. 14)), (ii) providing reimbursement information and services to customers (see, e.g., JANSSENBIO-008-00000777 (Guidance Doc. 25); JANSSENBIO-031-00016546; JANSSENBIO-018-00001010; JANSSENBIO-064-00003344; JANSSENBIO-045-00000537 (Ch. 13)), and/or (iii) providing educational support and/or programs to customers (see, e.g., JANSSENBIO-037-00001252; JANSSENBIO-055-00004234; JANSSENBIO-031-00016492) that was in effect at any time during the period 2001 to February 2020.		Scienter	Withdrawn

	Topic/Subtopic	Relevant Period	Relevance	Status
12	The reasons why You revised or replaced the compliance policy and/or guidance document concerning the provision of consulting and product-related services in 2015. See, e.g., JANSSENBIO-064-00003167.		Scienter	No issue raised in Mot. for Protective Order
13	The development and approval of the strategy to provide the IOI Support and Programs to IOI Customers, including the approval(s) to continue engaging in the strategy.	2	Value of the Remuneration; Purpose was to induce Rx/sales; Scienter	
14	An explanation of the infusion business model, IOI business model, and/or Remicade business model that You promoted to IOI Customers.	2	Value of the remuneration; Purpose was to induce Rx/sales	
15	Why You transferred responsibility for the Site of Care field team including ABSs from Immunology Sales to Immunology Marketing in 2015.		Acted knowingly; Scienter	No issue raised in Mot. for Protective Order
16	Your compensation system for ABSs including sales bonuses and contests and the Management By Objective (MBO) system and bonuses.	2	Value of the remuneration; Purpose was to induce Rx/sales; Providing the remuneration resulted in Rx/false claims	Addressed in a written answer on Aug. 2, 2024
17	The corporate organization and responsibilities of the departments, groups, and teams (such as sales, marketing, legal, compliance, regulatory, analytics, sales training, and finance) who had significant involvement in the strategy to provide the IOI Support to IOI Customers.	5	Provided the remuneration; Scienter	

Relevant Periods:

1	From the creation of the Program to until February 19, 2016
2	From the creation of the strategy to provide the IOI Support to IOI Customers to until February 19, 2016
3	From when You began providing the IOI Support and Programs to IOI Customers to until February 19, 2016
4	From Your first report to the Centers for Medicare & Medicaid Services under 42 C.F.R. § 403.904 and 42 U.S.C. § 1320a-7h to until February 19, 2016 (The tracking and reporting requirements under CMS's Open Payments Program (the Sunshine Act) have been in effect since 2013)
5	From 2010 to until February 19, 2016